

**CHAITMAN LLP**

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**Presentment Date: March 13, 2020 12:00 PM**

**Objection Date: March 6, 2019**

*Attorneys for Defendants Train Klan, a Partnership; Felice T. Londa, in her capacity as a Partner in Train Klan; Claudia Helmig, in her capacity as a Partner in Train Klan; Timothy Landres in his capacity as a Partner in Train Klan; Jessica Londa, in her capacity as a Partner in Train Klan; Peter Londa, in his capacity as a Partner in Train Klan; Timothy Helmig, in his capacity as a Partner in Train Klan; and Wendy Landres; in her capacity as a Partner in Train Klan*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

TRAIN KLAN, A PARTNERSHIP; FELICE T.  
LONDA, in her capacity as Partner in Train Klan;  
CLAUDIA HELMIG, in her capacity as a Partner in  
Train Klan; TIMOTHY LANDRES, in his capacity  
as a Partner in Train Klan; JESSICA LONDA, in her

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04905

(SMB)

capacity as a Partner in Train Klan; PETER LONDA, in his capacity as a Partner in Train Klan; TIMOTHY HELMIG, in his capacity as a Partner in Tran Klan; and WENDY LANDRES, in her capacity as a Partner in Train Klan,

Defendants.

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT  
OF APPLICATION TO WITHDRAW AS COUNSEL**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am a partner with Chaitman LLP, counsel of record to Defendants, Train Klan, a Partnership; Felice T. Londa, in her capacity as a Partner in Train Klan; Claudia Helmig, in her capacity as a Partner in Train Klan; Timothy Landres in his capacity as a Partner in Train Klan; Jessica Londa, in her capacity as a Partner in Train Klan; Peter Londa, in his capacity as a Partner in Train Klan; Timothy Helmig, in his capacity as a Partner in Train Klan; and Wendy Landres; in her capacity as a Partner in Train Klan (the “Defendants”). I submit this declaration in support of an application for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing Chaitman LLP to withdraw as counsel to the Defendants; and (2) granting such other and further relief as the Court deems just and proper. Unless otherwise stated, the foregoing is based on my personal knowledge.

2. The Trustee commenced this adversary proceeding against the original Defendants on December 2, 2010 (the “Adversary Proceeding”).

3. Thereafter, Felice T. Londa on behalf of Defendants retained Becker & Poliakoff LLP to represent them.

4. On behalf of Defendants, while at Becker & Poliakoff, LLP, I filed a Notice of Appearance on June 24, 2011 (ECF Doc. No. 8).

5. On behalf of the Defendants, as a partner of Chaitman LLP, I filed a Notice of Appearance and Request for Service of Papers on October 26, 2015 (ECF Doc. No. 45).

6. Differences have arisen which make it impossible for me to continue to represent the Defendants.

7. The Adversary Proceeding will not be disrupted or unduly delayed as a result of this firm's withdrawal as Defendants' counsel.

8. Accordingly, cause exists to grant the application authorizing Chaitman LLP to withdraw as counsel for the Defendants.

Dated: February 21, 2020  
New York, New York

/s/ Helen Davis Chaitman